## IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

AGERE SYSTEMS, INC., CYTEC INDUSTRIES INC., FORD MOTOR COMPANY, SPS TECHNOLOGIES, LLC and TI GROUP AUTOMOTIVE SYSTEMS L.L.C.,

Civil Action No. 02-CV-3830 (LDD)

Plaintiffs.

ν.

ADVANCED ENVIRONMENTAL TECHNOLOGY CORPORATION, et al.,

Defendants.

## DECLARATION IN SUPPORT OF PLAINTIFFS' MEMORANDUM OF LAW IN OPPOSITION TO DEFENDANTS' MOTION FOR PARTIAL SUMMARY JUDGMENT

GLENN A. HARRIS, ESQUIRE hereby certifies:

- I am a member of the law firm of Ballard Spahr Andrews & Ingersoll, LLP, and counsel for Plaintiffs in the above-captioned matter.
- I submit this declaration in support of Plaintiffs Memorandum of Law in Opposition to Defendants' Motion for Partial Summary Judgment.
- Attached hereto and marked Exhibit "A" is a true and correct copy of the Environmental Protection Agency 2000 Past Costs Report.
- True and correct copies of the EPA May 18, 1989 General Notice letters to AETC and Ashland, the July 28, 1989 General Notice letter to NRM, and the relevant portions of the September 28, 2000 Special Notice letter to American Cyanamid Company (including list of recipients) are attached hereto and marked Exhibit "B".
- True and correct copies of the relevant pages of the 2000 Consent Decree are attached hereto and marked Exhibit "C".
- True and correct copies of the relevant pages of the 2001 Consent Decree are attached hereto and marked Exhibit "D".
- A true and correct copy of the relevant sections of the Superfund Program Implementation Manual, Oswell Directive 9200.3-14-1GS is attached hereto and marked Exhibit "E".

8. A true and correct copy of the relevant pages of the EPA Federal On-Scene Coordinator's Report is attached hereto and marked Exhibit "F".

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated March 14, 2008

Glenn A. Harris, Esquire